

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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| Applicants: | Russell <i>et al.</i> | Conf. No.: | 6883 |
| Serial No.: | 10/706,546 | Art Unit: | 2167 |
| Filing Date: | 05/03/2006 | Examiner: | Koc, Tarik |
| Title: | COMPUTER-IMPLEMENTED METHOD, SYSTEM AND PROGRAM PRODUCT FOR MAPPING A USER DATA SCHEMA TO A MINING MODEL SCHEMA | Docket No.: | RSW920030186US1 (IBMR-0052) |

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

Applicants respectfully request a panel of experienced examiners perform a detailed review of appealable issues for the above-identified patent application pursuant to the Pre-Appeal Brief Conference Pilot Program. Applicants submit that the above-identified application is not in condition for appeal because the Office has failed to establish a *prima facie* case of obviousness based on an error in facts. Claims 1-8 are pending in this application.

Turning to the rejection, in the Final Office Action, 1-31 are rejected under 35 U.S.C. §102(e) as allegedly being unpatentable over Gorelik *et al.* (U.S. Patent Pub. No. 2005/0055369 A1), hereafter “Gorelick”. Applicants submit that this rejection is clearly not proper and without basis because at least one claim limitation is not met by Gorelick. As argued in the August 14, 2007 Amendment, Gorelick fails to teach or suggest each and every element of independent claim 1. In particular, Gorelick fails to teach matching by performing a number of types of matching processes in sequence until a match is found. August 14, 2007 Amendment, page 12,

second paragraph. The Office equates this feature of the claimed invention with the transformation discovery of Gorelick. Final Office Action, page 3, citing Gorelick, paras. 0370-0383. However, Gorelick does not teach that the transformation discovery is for matching columns to other columns, but instead, teaches that "...given a binding condition and correlation between...column[s], discover the transformation function." To this extent, the transformation discovery of Gorelick requires that a correlation has already been made. Furthermore, the transformation discovery of Gorelick does not perform different types of discoveries, but rather performs different approaches of the same type of discovery. Thus, unlike the claimed invention, Gorelick does not teach a number of unique types of matching processes performed in sequence until a match is found.

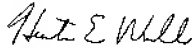
Accordingly, the Office has failed to state a prima facie case of anticipation, and this application is not in condition for appeal and should either be allowed as is, or re-opened for further prosecution.

With respect to the rejections of independent claims 9, 16 and 24, Applicants note that each claim includes a feature similar in scope to the matching by performing a number of types of matching processes in sequence until a match is found of claim 1. Further, the Office relies on the same arguments and interpretations of the cited references as discussed above with respect to claim 1. To this extent, Applicants herein incorporate the arguments presented above with respect to claim 1, and respectfully request withdrawal of the rejections of these claims for the above-stated reasons.

The dependent claims are believed to be allowable based on the above arguments regarding the claims from which they depend, as well as for their own additional features.

Applicants respectfully submit that the application is not in condition for appeal. Should the examining panel believe that anything further is necessary to place the application in better condition for allowance or for appeal, they are requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



Hunter E. Webb

Rcg. No.: 54,593

Date: February 1, 2007

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